



**October 2003  
FACT SHEET  
RGJ Inc. DBA Gouldings Lodge - Monument Valley, Utah  
NPDES Permit No. UT0025178**

**I.     Introduction**

RGJ Inc. DBA Gouldings Lodge ("Gouldings") was issued an NPDES permit (UT0025178) on September 30, 1998, for the Gouldings Lodge wastewater treatment lagoon facility. The permit became effective on November 1, 1998, and expired on October 31, 2003.

Applicant address:   RGJ Inc. DBA Gouldings Lodge  
                              P.O. Box 360001  
                              Monument Valley, UT 84536

Facility Manager:     Gerald LaFont  
                              (435) 727-3225

**II.    Background**

The Gouldings Lodge wastewater treatment lagoon facility is located in Monument Valley, San Juan County in the state of Utah, within the Northwestern portion of the Navajo Nation. The facility serves a population of approximately 1,000, receiving only domestic sewage with a design flow of 0.072 million gallons per day (MGD). The 3.23-acre treatment facility consists of a total of six (6) facultative lagoons, including two new ones that were added after the previous permitting cycle. In the previous permit, the four (4) original lagoons were configured with one entry lagoon, a second one with three partitions and two final lagoons. When the new lagoons were installed upstream, the lagoon with three partitions were reconfigured to be a single lagoon. The current configuration now includes six (6) lagoons in series, with the new lagoons being followed by the older ones which are dry.

There is no pretreatment, aeration nor disinfection of the wastewater flow at the facility. The lagoons are used for settling and natural die-off of fecal coliform bacteria. Final effluent is discharged intermittently through a 6-inch discharge pipe into Outfall No. 001 to receiving waters named Mitchell Butte Wash (dry wash), a tributary to the Oljeto Wash, an eventual tributary to the San Juan River. The discharge pipe has a shutoff valve that is opened when and if the water levels in the final lagoon required release. Currently, that lagoon is dry. Any sampling and monitoring under the proposed permit shall be performed at Outfall No. 001.

EPA has determined that effluent released in accordance with this permit will have no adverse effect on threatened or endangered species in the area so no requirements specific to the protection of endangered species are in the proposed permit. A copy of the permit and fact sheet is being sent to the U.S. Fish and Wildlife Service for review during the public comment period.

### III. Navajo Nation Water Quality Standards

Pursuant to the Water Quality Act of 1987 and the "EPA Policy for the Administration of Environmental Programs on Indian Reservations" (November 8, 1987), EPA will work directly with Indian Tribal governments on a one-to-one basis. This conforms with the Federal Indian Policy of January 24, 1983. The Navajo Nation has received Treatment as a State ("TAS") for Section 106 of the Clean Water Act ("CWA") They have applied but have not received TAS for the purposes of Section 303 of the CWA. Section 106 grant money was used to develop water quality standards and use designations, which must be approved under Section 303 by EPA Region 9. The Navajo Nation completed and adopted the Navajo Nation Surface Water Quality Standards ("NNSWQS") on September 7, 1999, and promulgated in November 1999. The NNSWQS, along with a TAS application under Section 303, was submitted to EPA in November 1999. A draft revision to the NNSWQS made on April 17, 2003, is awaiting review and approval by the Navajo Nation Council. In the interim until the NNSWQS are approved by EPA, those water quality standards will be used on a best professional judgment basis for purposes of developing water quality based effluent limitations.

### IV. Basis of Proposed Permit Requirements

The proposed discharge limitations are based on:

- A. Secondary Treatment Regulations contained in 40 CFR Part 133, Sections 133.101 through 133.105, promulgated September 20, 1984, and most recently amended on January 27, 1989. EPA used these regulations and its best professional judgment (BPJ) to develop limits for this facility.
- B. NNSWQS, which was promulgated by the Navajo Nation Council in November 1999.

### V. Designated Uses of the Receiving Water

The designated uses of the receiving water (nonperennial tributary drainages to the San Juan River), as defined by the NNSWQS are secondary human contact, ephemeral warm water habitat, and livestock and wildlife watering (Table 204.1, page 20.)

### VI. Determination of Effluent Limitations, Monitoring, and Reporting Requirements

- A. Flow Rates

Under the proposed permit, there is no flow limit but the monthly and daily maximum flows of both the influent and effluent must be monitored. The monitoring frequency is once/month.

B. Five-Day Biochemical Oxygen Demand (BOD5)

Under the proposed permit, the discharge shall not exceed a weekly average of 65 mg/l and monthly average of 45 mg/l BOD5, and shall achieve no less than a monthly average rate of 65% removal. These limits are required under 40 CFR Section 133.105.

Under 40 CFR Section 122.45(f), mass limits are required for BOD5. Based upon the 0.072 MGD flow, the mass limits for BOD5 are based on the following calculations:

Monthly average

$$\frac{0.072 \text{ MG}}{\text{day}} \times 45 \frac{\text{mg}}{\text{l}} \times \frac{8.345 \text{ lb/MG}}{1 \text{ mg/l}} \times \frac{0.45 \text{ kg}}{1 \text{ lb}} = 12.2 \text{ kg/day}$$

Weekly average

$$\frac{0.072 \text{ MG}}{\text{day}} \times 65 \frac{\text{mg}}{\text{l}} \times \frac{8.345 \text{ lb/MG}}{1 \text{ mg/l}} \times \frac{0.45 \text{ kg}}{1 \text{ lb}} = 17.6 \text{ kg/day}$$

The monitoring frequency is once/month.

C. Total Suspended Solids (TSS)

In the proposed permit, the discharge shall not exceed a weekly average of 135 mg/l and a monthly average of 90 mg/l TSS, and shall achieve no less than a monthly average rate of 65% removal. These limitations (Alternative State Requirements) are consistent with 40 CFR 133.101(f), 133.103(c), 133.105(b) and (d). Mass limit requirements in accordance with 40 CFR 122.45(f) have also been set in the proposed permit.

Mass limits are based upon the same calculations shown above for BOD5 and shall not exceed a 7-day average of 36.5 kg/day and a 30-day average of 24.3 kg/day. These limits are identical to those in the previous permit. The monitoring frequency is once/month.

D. Fecal Coliform

In the proposed permit, the monthly logarithmic mean of fecal bacteria shall not exceed 200/100 ml as a geometric average of samples collected during the calendar month, and 400/100 ml as a single sample maximum. These limits are more stringent than those in the previous permit and are based on the Navajo Nation surface water quality standards for secondary human contact (Table 206A.1, page 24.) The monitoring frequency is once/month.

E. Total Residual Chlorine (TRC)

The facility does not disinfect but limits are proposed in the event chlorination is ever used. If chlorination is used as part of the treatment process, the monthly mean of TRC shall not exceed 1 mg/l and no single sample shall exceed 1 mg/l. Sampling is to begin at the initiation of chlorination. The monitoring frequency is once/week. The regulations at 40 CFR 122.44(i) allow monitoring as determined to be necessary.

F. Total Dissolved Solids (TDS)

The proposed permit requires monitoring and reporting of both the influent and effluent TDS, as in the previous permit. The monitored frequency is once/week. The regulations at 40 CFR 122.44(i) allow requirements for monitoring as determined to be necessary.

G. Ammonia (as un-ionized NH<sub>3</sub>)

The proposed permit establishes monitoring requirement for ammonia. The monitoring frequency is once/quarter. If analytical results for the first four quarters reveal ammonia levels are below EPA's National Water Quality Criteria for ammonia, the monitoring frequency will decrease to once/year. The regulations at 40 CFR 122.44(i) allow requirements for monitoring as determined to be necessary.

H. pH

The proposed permit requires that effluent pH not fall below 6.5 or above 9.0 standard pH units, based on the Navajo Nation numeric water quality standards for aquatic, wildlife and livestock (Table 206B.1, p. 28.) for the Black Creek, a tributary to the Upper Puerco River, an eventual tributary to the Colorado River Basin. The monitoring frequency is once/month.

VII. Reporting

The proposed permit requires discharge data obtained during the previous three months to be summarized and reported monthly. If there is no discharge for the month, indicate "Zero Discharge." These reports are due January 28, April 28, July 28, and October 28 of each year. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the Navajo Nation.

VIII. General Standards

The proposed permit sets general standards that are narrative water quality standards contained in the Navajo Nation Surface Water Quality Standards, Section 203. These general standards are set forth in Section B. (General Discharge Specifications) of the permit.

IX. Permit Reopener

At this time, there is no reasonable potential to establish any other water quality-based limits. Should any monitoring indicate that the discharge causes, has the reasonable potential to cause, or contributes to excursions above water quality criteria, the permit may be reopened for the imposition of water quality-based limits and/or whole effluent toxicity limits. The proposed permit may be modified, in accordance with the requirements set forth at 40 CFR 122.44 and 124.14, to include appropriate conditions or limits to address demonstrated effluent toxicity based on newly available information, or to implement any EPA-approved new Tribal water quality standards.

X. Biosolids Requirements

The permittee shall submit a report 60 days prior to disposal of biosolids. The report shall discuss the quantity of biosolids produced, the treatment applied to biosolids including process parameters, disposal methods, and, if land applied, analyses for Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Molybdenum, Nickel, Zinc, and Selenium, and for organic-N, ammonium-N, and nitrate-N, all expressed in mg/kg biosolids on a 100% dry weight basis. The permittee shall comply with all standards for biosolids use and disposal of Section 405(d) of the CWA, and 40 CFR Parts 257, 258 and 503.

XI. Endangered Species Act

EPA has determined that discharge in compliance with this permit will have "no effect" on threatened or endangered species.

XII. Written Comments

Persons who wish to comment upon, object to the proposed action, or request a public hearing pursuant to 40 CFR Section 124.11 should submit their comments and requests in writing within thirty (30) days from the date of the Public Notice, either in person or by mail to:

U.S. Environmental Protection Agency, Region IX  
CWA Standards and Permits Office (WTR-5)  
Attn: Linh Tran  
75 Hawthorne Street  
San Francisco, CA 94105  
Telephone: (415) 972-3511

XIII. Information and Copying

The Administrative Record, which contains the draft NPDES permit, the fact sheet, comments received, and other relevant documents, is available for review and may be obtained by calling or writing to the above address.

All comments or objections received within thirty (30) days from the date of the Public Notice, will be retained and considered in the formulation of the final determination regarding the permit issuance.

XIV. Public Hearing

When public interest warrants, the Regional Administrator shall hold a public hearing and such notice of hearing shall be issued by public notice at least thirty (30) days prior to the hearing date. A request for a public hearing must be in writing and must also state the nature of the issue proposed to be raised in the hearing.